

August 31, 2010

Mr. Helder Gil, Legislative Affairs Specialist
Department of Consumer and Regulatory Affairs
1100 Fourth Street, SW, Room 5164
Washington, DC 20024

Greetings Mr. Gil:

SUBJECT: Notice of Proposed Rulemaking, Vol. 57-No. 26; June 25, 2010
(Extended Deadline – August 31, 2010)

Fairness and transparency are paramount among the concerns among licensed vendors all over the City. As such, attached is a proposed SAMPLE of a site assignment procedure many vendors say is fair in their opinion.

As such, this is to amend my comments regarding the Notice of Proposed Rulemaking, Vol. 57-No. 26; published June 25, 2010 to include the proposed SAMPLE site assignment policy daily vending as well as Ball Park vending.

My two major concerns regarding the Proposed Rulemaking continue to be:

1. The Proposed Rulemaking does not contain vending provisions for special occurrences including parades, festival, etc., as provided for by Special Event Vending: 32 DCR 1347 (March 8, 1985); and RFK Stadium vending as provided for by 24-0515.13: “Added New Vending Site in Ward 6 Neighborhood Commercial Zone”; 44 DCR 4691, Dated: 8/15/97.
2. The proposed new rulemaking is not consistent with other vending requirements in the City and does not clarify all vending provisions for vending around the Nationals Ballpark. Inconsistencies include: Hours of Operations, Vending Fees, Annual Site Assignment Procedures, Registration Procedures, Lottery Procedures, Grandfathering, Transparency, etc. SEE: Expanding Opportunities for Street Vending Around the Baseball Stadium Clarifying Temporary Amendment Act of 2008, effective October 21, 2008 (D.C. Law 17-241; 55 DCR 11704) – and amendments.

Consideration regarding the above would be greatly appreciated.

Respectfully submitted,

Brenda M. Sayles
Licensed DC Street Vendor
DC Resident & Tax Payer
Vending Task Force Rep. (5 Terms)
danburys@yahoo.com
(202) 635-9337 (Phone)
(202) 236-7857 (Cell)